

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

IN RE REGIONS MORGAN KEEGAN
SECURITIES, DERIVATIVE & ERISA
LITIGATION

No. 09-md-02009-SHM

This Document Relates to:

*In re Regions Morgan Keegan Closed-End
Fund Litigation,*

No. 07-cv-02830-SHM-dkv

**LEAD PLAINTIFFS' NOTICE OF UNOPPOSED
MOTION FOR PRELIMINARY APPROVAL OF
PROPOSED SETTLEMENT AND CLASS CERTIFICATION**

Lead Plaintiffs Lion Fund, L.P., Dr. J. Samir Sulieman, and Larry Lattimore (“Lead Plaintiffs”) and C. Fred Daniels, in his capacity as Trustee *Ad Litem* for the Leroy McAbee, Sr. Family Foundation Trust (the “McAbee Foundation Trust”), on behalf of the Class and TAL Subclass (collectively with Lead Plaintiffs and the McAbee Foundation Trust, “Plaintiffs”), respectfully move this Court for an Order, pursuant to Rule 23(e) of the Federal Rules of Civil Procedure, granting preliminary approval to the proposed settlement of this class action, certifying the Class and TAL Subclass for settlement purposes, and granting related relief.

This unopposed motion is premised on the accompanying supporting memorandum of law; the accompanying supporting Declaration of Joel H. Bernstein, with annexed exhibits; the Stipulation and Agreement of Settlement, with exhibits, dated as of October 12, 2012 and filed contemporaneously herewith; and all prior papers and proceedings in this action.

A proposed Order Preliminarily Approving Settlement and Providing for Notice is submitted herewith. A Certificate of Consultation made pursuant to Local Rule 7.2(a)(1)(B) is also submitted herewith.

Dated: October 12, 2012

Respectfully submitted,

LABATON SUCHAROW LLP

By: /s/ Joel H. Bernstein

Joel H. Bernstein
jbernstein@labaton.com
David J. Goldsmith
dgoldsmith@labaton.com
Nicole M. Zeiss
nzeiss@labaton.com
140 Broadway
New York, New York 10005
Telephone: (212) 907-0700
Facsimile: (212) 818-0477

*Lead Counsel for Lead Plaintiffs
Lion Fund, L.P., Dr. J. Samir
Sulieman and Larry Lattimore*

J. Gerard Stranch, IV (BPR #023045)
gstranch@branstetterlaw.com
BRANSTETTER, STRANCH
& JENNINGS, PLLC
227 Second Avenue North
Nashville, Tennessee 37201
Telephone: (615) 254-8801
Facsimile: (615) 250-3937

Liaison Counsel for Lead Plaintiffs

Crawford S. McGivaren
csm@cabaniss.com
R. Carlton Smyly
rcs@cabaniss.com
CABANISS, JOHNSTON, GARDNER
DUMAS & O'NEAL LLP
Suite 700, Park Place Tower
2001 Park Place North
Birmingham, Alabama 35203
Telephone: (205) 716-5237
Facsimile: (205) 716-5389

*Additional Counsel for C. Fred Daniels
in his capacity as Trustee ad Litem for the
Leroy McAbee, Sr. Family Foundation Trust*

George S. Trevor
gtrevor@pswplaw.com
PEARSON, SIMON, WARSHAW
& PENNY, LLP
44 Montgomery Street, Suite 2450
San Francisco, California 94104
Telephone: (415) 433-9000
Facsimile: (415) 433-9008

Additional Counsel for Plaintiffs